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March 9, 2016

Honorable Laura Taylor Swain  
United States District Judge  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: *Ottah v. BMW, et al.*  
Civil Action No. 1:15-cv-02465-LTS

Dear Judge Swain:

Defendants FCA US LLC, Ford Motor Company, Hyundai Motor America, Jaguar Land Rover North America, LLC, Kia Motors America, Inc., Toyota Motor Corporation, General Motors LLC, Mazda Motor Corporation, Fuji Heavy Industries, Ltd., and Nissan Motors Co. Limited (collectively, "Defendants") jointly request that the Court stay the initial pre-trial conference currently scheduled for March 31, 2016, pending the Court's ruling on the renewed dispositive motions discussed below.

Pursuant to the Court's February 10, 2016 Order (Dkt. No. 142), Defendants submitted renewed dispositive motions (Dkt. Nos. 144, 149, 154 and 155) on March 2 in response to Plaintiff's Second Amended Complaint (Dkt. No. 89). Defendants respectfully submit that a stay of the initial pre-trial conference is appropriate in view of these pending dispositive motions. The initial pre-trial conference can be rescheduled, if necessary, after the Court has heard and ruled on the pending dispositive motions.

Defendants telephoned Mr. Ottah on March 8 to discuss this request. Mr. Ottah does not consent to this request.

Respectfully,

/s/Turner P. Smith

Turner P. Smith  
Counsel for Toyota Motor Corporation

cc: Mr. Chikezie Ottah (by mail and e-mail eddyottah@yahoo.com)  
All Counsel of Record (by CM/ECF)